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*Attorneys for MediSys Health Network, Inc., The Brookdale Hospital Medical Center, The Jamaica Hospital d/b/a Jamaica Hospital Medical Center, Flushing Hospital and Medical Center, TJH Medical Services, PC and FRR Recovery, Inc.*

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re:

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Chapter 11

PENINSULA HOSPITAL CENTER, *et al.*

Case No. 11-47056 (ESS)

Debtors.

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(Jointly Administered)

**VERIFIED STATEMENT OF FARRELL FRITZ, P.C. AND  
FOLEY & LARDNER LLP PURSUANT TO BANKRUPTCY RULE 2019(a)**

Farrell Fritz, P.C. (“Farrell Fritz”) and Foley & Lardner LLP (“Foley”) hereby make the following statement (the “Statement”) pursuant to Rule 2019(a) of the Federal Rules of Bankruptcy Procedure in connection with their representation of multiple creditors of Peninsula Hospital Center and Peninsula General Nursing Home Corp. (together, the “Debtors”) in the above-captioned chapter 11 cases (the “Bankruptcy Cases”).

1. As of the date hereof, Farrell Fritz and Foley are counsel to the parties identified on the attached Exhibit “A” (collectively, the “Represented Parties”) in connection with these Bankruptcy Cases.

2. Each of the Represented Parties may hold, whether directly or indirectly, claims against and/or interests in certain of the Debtors arising out of, without limitation, rights under contract, law or

equity. The specific nature and amount of the claims or interests held by the Represented Parties is either set forth in their respective pleading or proof of claim, if any, filed in these Bankruptcy Cases or has yet to be finally determined.

3. In connection with these Bankruptcy Cases, each of the Represented Entities separately requested and retained Farrell Fritz and Foley to represent their respective interests in connection with these Bankruptcy Cases.

4. Farrell Fritz and Foley reserve the right to amend this Statement as necessary and will promptly supplement this Statement to the extent any material changes occur in the facts set forth herein or if they are retained by additional parties to represent them in the Bankruptcy Cases.

The undersigned hereby verify under penalty of perjury that the foregoing statements are true and correct to the best of the undersigned's knowledge and belief.

Dated: Uniondale, New York  
October 13, 2011

FARRELL FRITZ, P.C.

By: /s / Ted A. Berkowitz  
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## EXHIBIT A

### **Represented Parties**

- 1. MediSys Health Network, Inc.**  
8900 Van Wick Expressway  
Jamaica, NY 11418
- 2. The Brookdale Hospital Medical Center**  
1 Brookdale Plaza  
Brooklyn, NY 11212
- 3. The Jamaica Hospital d/b/a Jamaica Hospital Medical Center**  
8900 Van Wick Expressway  
Jamaica, NY 11418
- 4. Flushing Hospital and Medical Center**  
4500 Parsons Boulevard  
Flushing, NY 11355
- 5. TJH Medical Services, PC**  
89-06 135<sup>th</sup> Street  
Jamaica, NY 11418
- 6. FRR Recovery, Inc.**  
80 Marcus Drive  
Melville, NY 11747